



MEMORANDUM

DATE: September 11, 1989
TO: Distribution List
FROM: Paul E. Takacs *PT*
SUBJECT: L1630200005 -- St. Clair
Sauget Sites (Area I, II) -- Sauget
SF -- Compliance/Enforcement -- CONFIDENTIAL

In a conference call on September 7, 1989, Bruce Carlson, Joe Madonia and myself discussed the responses brought forth by Sauget area PRPs. Our discussions focused on policies that will be taken towards the PRP group that was notified in the August 7 letter.

Referring to requests made by Amax, Inc. and Monsanto for extensions of deadlines for the information request, it had been decided to move the 30 day period from September 7 to October 2. This would be consistent with suggested timeframes of Cerro and Amax, Inc. Notification date for PRPs willing to negotiate will remain September 22 and the meeting date will be postponed to October 30 (proportionate to our extension granted for the info request).

Replies made by the PRP group have been generally favorable. Midwest Rubber Reclaiming (MRR), Paul Sauget and the Village of Sauget will be given supplemental notice letters after the October 2 deadline. It had been decided to contact Empire Chemical Inc., parent company of MRR since it is evident that they are unaware of MRR involvement in Areas I and II. Since Paul Sauget and the Village of Sauget are also unaware of their involvement, these two parties will also receive similar responses.

Joe Madonia, who had been in contact with Monsanto attorney Tom Kuhns, indicated that Monsanto is willing to participate in Area I negotiations, but that they will not lead the effort. Because Cerro's main interests are located in Area I, it is expected that they will lead negotiations here. Cerro will be notified of Monsanto's apparent intentions.

Monsanto is subsequently preparing another work plan for Site R (Sauget Toxic) and it is probable that they will submit this as a part of their final reply.



Page 2

Bruce Carlson's conversations with Sterling Steel Foundry (SSF) attorney, Alphonse McMahon have brought up questions of liability between SSF and former owner, Sterling Steel Casting. Mr. McMahon has indicated that we would be able to view their files but that we would not be able to remove them (or copies) from their premises before consulting with the former owner. In this particular instance, we may be able to recover these records as well as records from MRR, Paul Sauget and the Village under the new Discovery law if these parties are unwilling to surrender them. Mr. Carlson and myself have tentatively scheduled a time next week to review these files at SSF.

PT:bjh/3175k/1,2

cc: Division File
Joe Madonia, AGO
Chris Zeman, AGO
Terry Ayers
Jim Frank
Bharat Mathur
Bill Child
Bruce Carlson
Gary King